

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Nautilus Insurance Company,

Plaintiff,

Versus

Richard Alexander Murdaugh, Sr., Cory
Fleming, Moss & Kuhn, P.A., Chad
Westendorf, and Palmetto State Bank,

Defendants.

C/A No. 2:22-cv-1307-RMG

**DEFENDANT MOSS & KUHN, P.A.'S
SECOND SUPPLEMENTAL PRETRIAL
DISCLOSURES - EXHIBIT LIST**

- iii. **EXHIBITS** – as identification of each document or other exhibit, including summaries of other evidence, separately identifying those items the party expects to offer and those it may offer if the need arises:

This Defendant reserves the right to introduce any documents that the Plaintiff produced and those produced by any party during the course of discovery or marked at any deposition as exhibits. This Defendant may offer the following exhibits:

Exhibit #	Bates #	Description
1	NAUTILUS_006358-006359	Email from Joel Lasky at Nautilus dated 5/2/18
2	NAUTILUS_000287-000288	Emails between Amy Miller and John Grantland dated 11/27/18
3	Miller/Nautilus 000550	Email from Amy Miller to John Grantland dated 3/13/19
4	Moss & Kuhn 0212	Email from John Grantland to Jon Austen and Cory Fleming dated 3/19/19
5	NAUTILUS_006380-006382	Emails between Amy Miller and Katherine Karam dated 3/24/19
6	PHELPS-000932-000934	Emails between Amy Miller and Katherine Karam dated 3/24/19
7	Moss & Kuhn 0128-0130	Mediation Agreement signed 3/25/19
8	Miller/Nautilus 00074	Email from Amy Miller to John Grantland and Jon Austen dated 3/25/19
9	Moss & Kuhn 0218	Emails between Amy Miller and John Grantland dated 3/25/19
10	Moss & Kuhn 0027	Email from John Grantland to Cory Fleming and copying Amy Miller dated 3/25/19

11	Nautilus_002402-002551	Internal Nautilus communications dated 3/22/18 through 3/26/19
12	NAUTILUS_006377	Emails between Amy Miller and Joel Lasky dated 3/27/19
13	CHF_00082-00085	Letter from Cory Fleming to John Grantland dated 4/11/19 with signed Release
14	Moss & Kuhn 0091-0093	Release dated 4/11/19
15	CHF_00051	Check for \$3,800,000 payable to Chad Westendorf as PR of the Satterfield Estate dated 4/18/19
16	CHF_00081	Letter from John Grantland to Cory Fleming dated 4/22/19
17	Moss & Kuhn 0020	Emails between Cory Fleming and John Grantland's office dated 4/25/19
18	Moss & Kuhn 0021	Emails between John Grantland and Cory Fleming dated 5/6/19
19	Moss & Kuhn 0241-0243	Emails between John Grantland and Cory Fleming dated 5/6/19 regarding settlement approval hearing
20	Miller/Nautilus 000700-000701	Emails between Amy Miller and John Grantland dated 5/10/19
21	Moss & Kuhn 0034	Emails between Cory Fleming and John Grantland's office dated 5/13/19
22	M&G001935-000048	Email from John Grantland to Amy Miller dated 5/13/19
23	Moss & Kuhn 0014-0016	Letter from Cory Fleming to John Grantland dated 5/13/19 with Order Approving Settlement
24	CHF_00107-00110	Order Approving Settlement dated 5/13/19
25	Moss & Kuhn 0120-0127	Petition for Approval of Settlement dated 5/13/19
26	NAUTILUS_000683-000684	Emails between Amy Miller and John Grantland dated 5/14/19
27	M&G001960	Email from Judge Mullen law clerk to John Grantland's office dated 6/13/19
28	CHF_00033-00035	Stipulation of Dismissal filed 10/5/20

This Defendant specifically reserves the right to supplement his Exhibit List prior to trial.

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December 12, 2024

Charleston, South Carolina

/s/ Maryrose P. Williamson

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